

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.1 Identify and describe all fiber meet point arrangements established by Verizon in Massachusetts.

- (a) With respect to each and every fiber meet point arrangement identified in response to this data request, identify the other party to the fiber meet point arrangement, i.e. local exchange carrier, interexchange carrier, or other entity.
- (b) With respect to each and every fiber meet point arrangement identified in response to this data request identify the physical location of the arrangement in Massachusetts by reference to street address, municipality, county or other general geographic reference.

**ERRATA
REPLY:**

- (a) Verizon states that it has a total of nine fiber meet point arrangements established in Massachusetts with a total of four local exchange carriers.
- (b) In compliance with the Arbitrator's ruling of September 7, 2006, please see the attached proprietary response.

ITEM: Charter 1.1
ERRATA
REPLY: Cont'd

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BEGIN PROPRIETARY

END PROPRIETARY

VZ #1E

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.10 Identify and describe all fiber meet point arrangements established by Verizon with another local exchange carrier (incumbent LEC or competitive LEC), IXC or other entity which Verizon contends are currently underutilized, or do not represent an efficient use of network resources.

**SECOND
SUPPLEMENTAL
REPLY:** In compliance with the Arbitrator's ruling of September 7, 2006, please see the attached proprietary response.

ITEM: Charter 1.10
SECOND
SUPPLEMENTAL
REPLY: Cont'd

BEGIN PROPRIETARY

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VZ #10SS

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter
Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.23 **REVISED:** State Verizon's costs of interconnecting via leased facilities arrangements with Charter.

**SUPPLEMENTAL
REPLY:** In compliance with the Arbitrator's ruling of September 7, 2006,
please see the attached proprietary response.

ITEM: Charter 1.23
SUPPLEMENTAL
REPLY: Cont'd

BEGIN PROPRIETARY

END PROPRIETARY

VZ #23S

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-56

Respondent: Willett Richter

Title: Senior Specialist - Engineering

REQUEST: Charter Fiberlink MA-CCO, LLC, Set #1

DATED: August 4, 2006

ITEM: Charter 1.30 **REVISED:** Identify the amount of Verizon's underutilized stranded investment in Massachusetts as it pertains to fiber meet point arrangements and/or OC3 fiber optic facilities. The term "stranded investment", as used here, shall have the same meaning as that term is used on page 7, lines 11 and 12, of the Testimony of Willett Richter on behalf of Verizon New England, Inc., d/b/a Verizon Massachusetts, as filed in D.T.E. Docket 06-56 on August 2, 2006.

**SUPPLEMENTAL
REPLY:** With respect to "underutilized stranded investment" in fiber meet facilities, please see Verizon's response to Charter 1.10. With respect to OC3 fiber optic facilities, Verizon states that many OC3 fiber optic systems that Verizon has deployed in Massachusetts are used to provide point-to-point special access services to customers and it is not possible for Verizon to measure traffic on those systems. In addition, for those OC3 fiber optic systems that Verizon has deployed in Massachusetts to carry Verizon traffic, Verizon states that it does not routinely measure traffic over its interoffice fiber transport systems nor does it maintain usage studies of those systems in a centralized database.

In an effort to be responsive, Verizon conducted a special study of its OC3 transport systems in Massachusetts that have at least one DS1 activated to estimate the percentage of interoffice systems that currently operate at less than 70% of a DS3 level. Since Verizon is unable to measure actual call volumes on these systems, Verizon's special study assumes that working systems with less than 20 DS1s activated (roughly 70% of the capacity of a DS3 i.e., 28 DS1s) represent "underutilized stranded investment." Based on Verizon's special study, approximately 23% of Verizon's in service interoffice OC3 systems currently have fewer than 20 DS1s activated.

VZ #30S